NEVADA NUCLEAR WASTE TASK FORCE, INCORPORATED

Non-profit Public Advocacy

c/o Judy Treichel
Executive Director
4587 Ermine Court
Las Vegas, NV 89147-5178

judynwtf@aol.com
Phone: 702-248-1127
Fax: 702-248-1128

July 6, 2011

Comments on the:
Reactor and Fuel Cycle Technology Subcommittee
Report to the Full Commission Draft

The comments submitted by the Nevada Nuclear Waste Task Force (Task Force) on both the Transportation and Storage Subcommittee and the Disposal Subcommittee reports made it clear that we firmly believe that before any national policy or program can be developed for the management, storage and/or disposal of the nation's irradiated fuel and high-level nuclear waste, the public must be engaged in a discussion that begins by an explanation of, and agreement on, exactly what problem is being addressed. The Reactor and Fuel Cycle Technology Subcommittee report, while considering questions that the Commission devised when beginning its work, seems far afield from the question of the problem of waste. This report is more or less devoted to the part of the Blue Ribbon Commission's title that fueled an immediate outcry from public interest organizations – "America's Nuclear Future."

Groups and individuals who oppose new reactors and the future generation of waste, as does the Task Force, find it difficult to comment on this report. This analysis of "how to produce waste better" or "produce better waste" is not what we believe will be particularly useful in a national discussion regarding safe and acceptable waste management and/or disposal. The Commission's final report and recommendations are anticipated to be an answer to "what do we do after Yucca Mountain?" This Subcommittee report is unrelated to that nationally important question.

The first part of the Subcommittee's two-fold conclusion on page v of the report states: "...the United States should continue to pursue a program of nuclear energy research..." The Task Force believes that there is value in research, especially if it is "to improve the safety and performance of existing technologies" as is stated. However, the research recommended here ***should not*** be done with the aim of development and deployment of new waste producing technologies.

The second part of the conclusion states that "...we do not believe that new technology developments in the next three to four decades will change the underlying need for an integrated strategy that combines safe, interim storage of spent nuclear fuel with expeditious progress toward siting and licensing a permanent disposal facility or facilities." We agree that very likely there will be no magic bullet anytime soon, if ever, that will make

the waste disappear or become a non-problem. Obviously there is a need for interim storage and we have it, at the reactor sites, where it will and should continue until a better, publicly approved storage or disposal system is developed. However, we completely disagree with the sense of urgency that was inserted into each of the Subcommittee reports. The best way to head toward another series of mistakes (as was the case with Yucca Mountain) would be to rush into any storage or disposal siting process before publicly acceptable standards are in place, and agreement is reached about what agency or entity will carry out the program.

Comments on Recommendations:

#1. Non-proliferation and counter terrorism are valuable goals. Our belief is that those priorities not only get lost in R & D programs for advanced nuclear technology but such programs may well be counterproductive. Other countries may decide to engage in similar development. In many cases, there is suspicion that other countries' programs are aimed at weapons design or manufacture even if they say that the efforts are directed toward commercial uses.

1) Many currently operating reactors have reached the end of their licensed lifetime and should be decommissioned rather than the subject of fixes that would allow them to continue running. Safety and regulatory compliance is the job of the Nuclear Regulatory Commission and should be more carefully policed.

2) Additional or increased safety will not result from new reactors. If non-proliferation means keeping weapons grade materials out of the hands of other countries, it will not be accomplished by building more and newer reactors.

The Subcommittee is absolutely correct in saying that federal budgets are tight and expenditures must be carefully considered. The programs suggested here are not beneficial expenditures.

#2. We concur that there is a need for better coordination of energy policies and programs however we are working toward and supporting a carbon free, nuclear free future for the country. We support research into sustainable, renewable energy.

#3. The Nuclear Regulatory Commission should be fully funded to do its work as a regulatory agency, more inclined to enforce safety rules and less cooperative with the industry they police. NRC does not need additional funds that would assist the agency and developers of new technology for assurance of licensing.

#4. We strongly agree with this recommendation if it is carried out ***without*** development or deployment of reprocessing facilities or technologies. The lessons from Fukushima are that waste is safer stored in dry casks; that reactors are vulnerable to earthquakes; and those located near seacoasts are at risk when tsunamis hit. Unique problems have occurred and continue because of the design of those reactors. We believe that reactors in the U.S. of similar design and age should be phased out. We also agree that the IAEA should be involved in all nuclear facilities including those in the U.S.

The program for return of irradiated fuel that originated in the U.S. is simply compliance with agreements the U.S. made when reactor technology and fuel were supplied to other countries. We agree that the spent fuel should be returned but do not support future programs of this nature. We oppose any encouragement by the U.S. for other countries to develop or use nuclear technology except perhaps for medical purposes. In some cases it may also be beneficial internationally for some nuclear materials to come to the U.S. for safer, accountable storage and to avoid the spread of weapons manufacture at any scale.

Regarding the discussion on page x of the report, we do not support future development or deployment of new reactors and do not endorse nuclear energy as a source of future energy.

In the final section of the report – **6. Conclusions** – on page 91you say: "Another important question for the Subcommittee, and one that is directly relevant to the main charge before the BRC as a whole, was whether any known or anticipated advances in nuclear technologies could fundamentally alter the waste management challenge the United States confronts over the next few decades. We concluded that the answer to this question was no."

Yes, the main charge for the BRC was: What should happen with nuclear waste? You correctly conclude here that advances in nuclear technologies or building newer and better waste generators, will ***not*** solve or lessen the problem.

The Nevada Nuclear Waste Task Force opposes any recommendations by this Subcommittee to increase or enhance development, demonstration or deployment of new nuclear technology. We endorse only research aimed at examination of possible ways to better contain and isolate the waste that has been produced commercially and resulting from weapons production. Additionally we oppose efforts by the U.S. to encourage other countries to develop or enlarge their nuclear industries. Expanded deployment of nuclear technology internationally does not increase the safety of the U.S., whether such increases come from cooperation or assistance programs with countries that are allies, or inadvertently encourage countries hostile to the U.S. to engage in programs that will provide them with nuclear weapons they believe are necessary to ward off perceived threats or to raise their international recognition. Such results would be counter to all of the goals established by the BRC – safer waste management, publicly acceptable long term waste solutions, and the reduction of threats from nuclear proliferation.

Submitted by,

Judy Treichel
Executive Director